



JEFFERSON COUNTY DEPARTMENT OF HEALTH

1400 SIXTH AVENUE, SOUTH • P.O. Box 2648 • BIRMINGHAM, AL 35202-2648 • 205.933.9110 • WWW.JCDH.ORG

Environmental Health Services
Jonathan Stanton, P.E., Director

January 19, 2017

Michael E. Malaier
Chief, Air Assessment Unit
Field operations Division
Al. Department of Environmental Management
PO Box 301463
Montgomery, AL 36130-1463

Re: Redesignation/Reclassification of Pollutant-Specific Monitoring at the Shuttlesworth Monitoring Site

As previously discussed, please find below the Department's proposed and intended rationales for redesignating and reclassifying the status of the Shuttlesworth monitoring site with respect to PM₁₀, PM_{2.5}, and SO₂ (from SLAMS to SPMS).

PM₁₀

Historically, the PM₁₀ monitor at the Shuttlesworth site was established as a fence-line site designed to monitor values from contributions from the now-closed Sloss Mineral Wool plant and was designated as a source-oriented SPM site with a "Neighborhood" spatial scale. For reasons that are unclear and unknown at this time, at some point in time, this monitoring site was incorrectly designated as a SLAM Site and was listed as "High Population Exposure" in previous plans, although it retained a spatial scale of "Neighborhood."

This 2016 network plan addendum is submitted as an attempt to correct these previous designation/classification errors regarding PM₁₀ monitoring at the Shuttlesworth monitoring site. Accordingly, the Department proposes and intends to list and designate this monitoring site as a source-oriented SPM with a microscale source oriented monitor with respect to PM₁₀. As further evidence of the needed for reclassification, the PM₁₀ concentration average for 2013-2015 at the monitoring site is approximately 14.7 % of the standard and no violation(s) have occurred since November 6, 2007, even before the most proximate and culpable source, the Sloss Mineral Wool plant ceased operations.

As part of this redesignation/reclassification request, the Department expressly relies on the following applicable regulatory SLAMS exemption language of 40 CFR 58.14 (c):

(1) Any PM 2.5, O3, CO, PM 10, SO2, Pb, or NO2 SLAMS monitor which has shown attainment during the previous five years, that has a probability of less than 10 percent of exceeding 80 percent of the applicable NAAQS during the next three years based on the levels, trends, and variability observed in the past, and which is not specifically required by an attainment plan or maintenance plan.

The PM10 concentrations at the Shuttlesworth monitoring site qualify for exemption based on the above regulatory language.

PM2.5

Although not required by regulations and even in lieu of the non-existence of PM2.5 concentration problems in the area, the Department agreed to conduct PM2.5 continuous monitor at Shuttlesworth site from July 1, 2013 to September 30, 2014 with the understanding that this monitor would be operated and classified as a special purpose (SPM), non-SLAMS monitor, due to the temporal nature of the agreed upon monitoring. However, similar to the classification and designation issues surrounding PM10 monitoring at this site, again, for reasons that are unclear at this time, the PM2.5 monitor was incorrectly listed and classified as a SLAMS monitor in the final 2016 network plan. Based on the monitor type (non-FEM) and the intention of its use, the Department similarly intends modify the current incorrect designation back to an SPM with a microscale source oriented-monitor.

SO2

The Department agreed to conduct SO₂ monitoring at the Shuttlesworth site, at the express request of EPA, for one year beginning in calendar year 2016 for one year to better evaluate SO₂ concentrations in the North Birmingham area. Again, for reasons that are unclear at this time, this monitor was similarly and incorrectly listed as a SLAMS monitor in the final 2016 network plan. Since the Department already operates the minimum two (2) requisite SO₂ monitors (N.Bham and Fairfield monitoring sites), the Shuttlesworth monitor is a special purpose monitor (SPM) and the Department intends to similarly redesignate and reclassify this monitoring site accordingly, with respect to SO₂ monitoring. The Department will, however, will enter the concentration values into AQS. If at the end of the year the Shuttlesworth monitoring for SO₂ results in values that exceed the current SO₂ NAAQS, the Department may continue to conduct further monitoring to determine a valid design value and NAAQS compliance status.

The Department has included the enclosed/attached table to summarize the addendum changes.

Please advise should you have any concerns and/or questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Corey Masuca', with a long horizontal flourish extending to the right.

Corey Masuca, PE, PhD
Principal Air Pollution Control Engineer
Air and Radiation Protection Division

Brown, Ryan

From: Palmer, Darren
Sent: Thursday, December 1, 2016 2:16 PM
To: Brown, Ryan
Subject: FW: Shuttlesworth

FYI

From: Palmer, Darren
Sent: Thursday, December 01, 2016 1:31 PM
To: 'Howanitz, Jason' <Jason.Howanitz@jcdh.org>
Subject: RE: Shuttlesworth

Jason, I'm glad y'all have the opportunity to work from home. (b) (6)

So there are a few things here....

First, to help clear up any misunderstanding about monitors (whether SLAMS or not) that are proposed to begin operation after the plan has been either submitted or approved, let me see if I can explain something about the network plan. The network plan is typically considered to represent the current network and cover proposed changes to an agency's network for 1.5 yrs. Example: the plan submitted July 1, 2016 is generally considered to cover the network and any changes from July 1, 2016 through Dec 31, 2017. Also, using this year's network plan as an example, our expectation - unless otherwise proposed and agreed upon - is that proposed changes are approved to occur on by Jan 1, 2017. So if we agreed that a monitor can be discontinued, we are agreeing that it can be shut down on Dec 31, 2016 or after (unless otherwise explicitly stated in our response letter). Same for a new monitor - except in this case we are agreeing that it can be started up no later than January 1, 2017 (unless otherwise stated). Otherwise, our expectation is that monitors that aren't proposed to shut down, will operate for the entirety of the 2017 calendar year (notwithstanding unforeseen circumstances of course). This is not a Region 4 understanding of the network plan. This is an EPA agency general understanding. [after reading back over this paragraph multiple times, I'm not sure how helpful this is. Oh well.]

In fact we have several agencies in Region 4 who called their plan submitted July 1, 2016, the "2017 Annual Network Plan". I personally don't like that as I think that adds a level of confusion, but I understand the reasoning behind it (pretty much for the reasons stated above).

Second, going back a few years (at least back to 2013 when the tables in the plan submitted by ADEM were expanded to include monitor type), the network plans submitted for public comment and reviewed by us all indicate the PM10 monitors are SLAMS at Shuttlesworth - the manual and continuous samplers (I understand there is no manual sampler there anymore). I can email you all the network plans. But these are the final official documents of your network even if you didn't review what ADEM submitted. What's in AQS doesn't go through public comment. Your agency's unwritten intentions don't go through public comment. What is written in these documents do - whether intended or not. We've made mistakes before by not carefully reviewing every little descriptor listed for each site. This is why we require all proposed changes be clearly stated up front in each plan and we try to clearly respond what we are and are not approving. If ADEM is modifying the document you send to them - more than just administrative changes, that is a conversation y'all need to have to clear that up.

So, again, whether your intent is that these monitors are not SLAMS, it isn't listed that way in these final network plans.

You have at least two options. Both involve the public comment process.

1. your agency can submit an addendum to the plan to EPA at any time, clearly describing the changes to your network. I would highly recommend cc'ing ADEM.
2. you can spell all this out in the annual network plan due July 1, 2017.

Also, just stating that you never intended for a monitor to be labeled SLAMS, isn't going to get very far with us (at least not at the staff level). Just being honest.

Third, I'm not sure, but it almost seems if there is a misunderstanding of SLAMS vs SPM with regards to NAAQS comparability. You ask several different people here in Region 4 (Atlanta and Athens), and you'll likely get a couple different answers on what the label "SLAMS" indicates. My opinion is that any FRM/FEM monitor labeled SLAMS is NAAQS comparable. Certainly monitors that are required by regulations should be labeled SLAMS. Where the difference of opinion comes in is with regards to PM2.5 TEOMs (and not with SO2 or PM10). 40 CFR Part 58 App. D 4.7.2 requires continuous PM2.5 monitors to be collocated in MSA's with required PM2.5 monitors. When this part of the regulation was promulgated we didn't have continuous FEMs. So while TEOMs satisfy that requirement, we all know they aren't designated as an equivalent method for NAAQS comparison purposes. Some think these should be labeled SLAMS because they are required by the regs. I'm of the opinion they don't have to be. In fact, I'd actually prefer they NOT be labeled SLAMS – but there is nothing in the regs that really make this clear.

Ok, having said all that... monitors labeled SPM but using regulatory methods can still be compared to the NAAQS. <-- it's this that I need to make sure you and others in your agency are aware. The regs are clear in 40 CFR §58.20(c) that SPMs operating for longer than 24mo are absolutely comparable (if they employ FRM/FEM). And 40 CFR §58.20(e) states that EPA won't base a nonattainment designation on a SO2 or PM10 monitor (or CO or NO2) solely on the data from that SPM if it is discontinued within 24mo. So just because a particular criteria pollutant monitor or analyzer is labeled SPM, that doesn't preclude EPA from considering any data produced.

[In my opinion, agencies who are requesting a change in monitor type from SLAMS to SPM, are doing so in order to have the 'flexibility' to shut them down on a whim without 'getting permission'. While I can understand the glamour behind that sentiment, again, my opinion is it is disingenuous and misleading.]

Any of us are happy to have further conversations with you and anyone else there.

This upcoming year, you are welcome to submit to us the same plan that you initially submit to ADEM. But again, I'd encourage you to always look at the combined plan that goes out for public comment including ADEM's description of changes to your network.

Darren Palmer
USEPA - Region 4
APTMD/AASB
Air Data & Analysis Section
PH: (404) 562-9052
FX: (404) 562-9095
<http://www.epa.gov/region4>

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-----Original Message-----

From: Howanitz, Jason [mailto:Jason.Howanitz@icdh.org]

Sent: Thursday, December 01, 2016 11:53 AM

To: Palmer, Darren <Palmer.Darren@epa.gov>

Subject: Shuttles worth [WARNING: SPF validation failed]

Darren,

After reviewing the drafts we sent and the final one ADEM sent us and comparing to the public noticed document, that a mistake was made after we sent our plan. We only had PM10 as a SLAMS site (or even on the table) . Not sure how that happened but we will be working to amend that. Also, if we were not planning on operating SLAMS in 2016, am I crazy to ask why it is covered under the 2016 plan?

I am working from home (b) (6)

Thanks

Jason Howanitz, MSCE, PE

Senior Air Pollution Control Engineer

Air and Radiation Protection Division

205-930-1284

Brown, Ryan

From: Garver, Daniel
Sent: Wednesday, January 11, 2017 11:15 AM
To: Brown, Ryan; Palmer, Darren; Walther, Katherine
Subject: FW: Notification of Exceedances or Violations from SO2 DRR Monitors

From: Howanitz, Jason [mailto:Jason.Howanitz@jcdh.org]
Sent: Wednesday, January 11, 2017 10:34 AM
To: Garver, Daniel <Garver.Daniel@epa.gov>
Subject: RE: Notification of Exceedances or Violations from SO2 DRR Monitors

Daniel,

We will deal with that scenario if we encounter a violation/exceedance. I would note that we are doing a special study for one year and our only agreement was to do enter all data into AQS. Our monitor is not a SLAMS monitor but got categorized by mistake (not sure how) for the SO2 and I am working on an addendum so it would not fall into that category. I realize the opinion but our responsibilities are well detailed and we will follow those, but I would disagree that we fall under the same DRR requirements since we are not subject to DRR. Having said that, if we do incur an exceedance we will report it "within 30 days of any exceedances or violations." Let me know if you have any questions.

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

From: Garver, Daniel [mailto:Garver.Daniel@epa.gov]
Sent: Wednesday, January 11, 2017 8:00 AM
To: Howanitz, Jason
Cc: Rinck, Todd; Palmer, Darren; Walther, Katherine
Subject: FW: Notification of Exceedances or Violations from SO2 DRR Monitors

Hi Jason,

Todd recently sent the message below to all of the agencies conducting monitoring under the SO2 DRR. I wanted to pass this along because the requirement to report exceedances or violations applies to the Shuttlesworth SO2 monitor as well, even though it is not operating as a DRR monitor. If possible, we would encourage you all to meet this requirement by reporting the data to AirNow. Please let Todd, Darren, or I know if you have any questions about this. Thanks for JCDH's efforts in successfully starting up the SO2 monitor before January 1.

Thanks,

Daniel Garver
Environmental Scientist
US EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
(404) 562-9839

From: Rinck, Todd

Sent: Tuesday, January 10, 2017 4:49 PM

To: Oser, DeAnna <DeAnna.Oser@dnr.ga.gov>; 'John Evans (john.c.evans@ncdenr.gov)' <john.c.evans@ncdenr.gov>; Joette Steger <joette.steger@ncdenr.gov>; 'John Gowins' <john.gowins@ky.gov>; mml@adem.state.al.us; 'kevin.lance@buncombecounty.org' <kevin.lance@buncombecounty.org>

Subject: Notification of Exceedances or Violations from SO₂ DRR Monitors

Hello State and Local DRR Contacts,

Thank you for your recent efforts in successfully installing the SO₂ Data Requirements Rule monitoring network. I want to remind you that under the Air Planning Agreement (or PPA/PPG as applicable) your agency has committed to notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutant SLAMS or SPMs (which includes the SO₂ DRR monitors).

I understand that some agencies are already meeting this requirement by reporting the SO₂ DRR data to AirNow. We appreciate this data reporting, and encourage all agencies to report the SO₂ DRR monitoring data to AirNow, if possible, as this will increase public availability of the data and efficiently satisfy your grant commitment. However, if your agency decides not to report the data to AirNow, please notify your EPA Region 4 state air monitoring contact and copy Daniel Garver and Katie Walther (Region 4 SO₂ monitoring contacts) within 30 days of any exceedances or violations at the SO₂ DRR monitors.

If you have any questions about how to report data to AirNow or the grant requirement, please feel free to contact me.

Todd
(404) 562-9062



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 05 2017

Mr. Ronald W. Gore
Chief
Alabama Department of Environmental
Management, Air Division
1400 Coliseum Boulevard
Montgomery, Alabama 36130

Dear Mr. Gore:

Thank you submitting the addendum dated April 7, 2017, to Alabama's annual ambient air network plan (Network Plan Addendum). The Network Plan Addendum proposes changes to the ambient air monitoring networks for both the Alabama Department of Environmental Management (ADEM) and the Jefferson County Department of Health (JCDH). We understand the public comment period ended on March 20, 2017. No comments were received on the proposed relocation of the Wetumpka and Phenix City monitoring sites. However, comments were received on the proposed changes for the JCDH network.

Changes to ADEM's Network

The ADEM requested to relocate an ozone (O_3) site in the Montgomery metropolitan statistical area (MSA) and to combine the O_3 and particulate matter less than 2.5 microns ($PM_{2.5}$) sites into one site in the Phenix City MSA. The ADEM lost its lease for the Dewberry Trail O_3 site (Air Quality System (AQS) # 01-051-0001) in the Montgomery MSA. According to 40 CFR Part 58, Appendix D, Table D-2, the ADEM is required to operate and maintain two O_3 monitoring sites in this MSA. The ADEM proposes to establish a new site at 206 Queen Ann Road, Wetumpka, Alabama. The EPA Region 4 staff visited this location on August 30, 2016, and gave verbal approval to Mike Malaier and Gina Curvin to use it as an O_3 monitoring site. The U.S. Environmental Protection Agency Region 4 staff understand that the ADEM began operating this site (new AQS # 01-051-0002) on March 17, 2017. The EPA formally approves this location to be the second O_3 site in the Montgomery MSA. The site will begin operating in the 2017 O_3 season.

The ADEM is also proposing to combine its O_3 and $PM_{2.5}$ sites in the Phenix City MSA into one single multipollutant monitoring site to be located at the Phenix City-South Girard School (AQS # 01-113-0003). The ADEM lost its lease to the $PM_{2.5}$ site (AQS # 01-113-0001) in September 2016. That site houses collocated $PM_{2.5}$ federal reference method (FRM) samplers, two chemical speciation network samplers, and a continuous $PM_{2.5}$ non-federal equivalent method (FEM) sampler. The ADEM has already moved the collocated $PM_{2.5}$ FRM samplers to the new location (as of January 18, 2017) while the O_3 monitor continues to operate at its original site (AQS # 01-113-0002). The ADEM plans to operate the O_3 monitor at the original site for the full 2017 ozone monitoring season ending October 31, 2017, at which time the site will be shut down and the equipment will be relocated to the Phenix City-South Girard School site.

O₃ monitoring will resume at the newly combined site on or by March 1, 2018. The EPA approves this plan. For each of these new sites, please be sure to update the network plan with photos and evidence the site meets siting criteria found in 40 CFR Part 58, Appendix E. Also, all of the criteria pollutant monitors should be designated as State or Local Air Monitoring Stations (SLAMS) in EPA's Air Quality System since they are required.

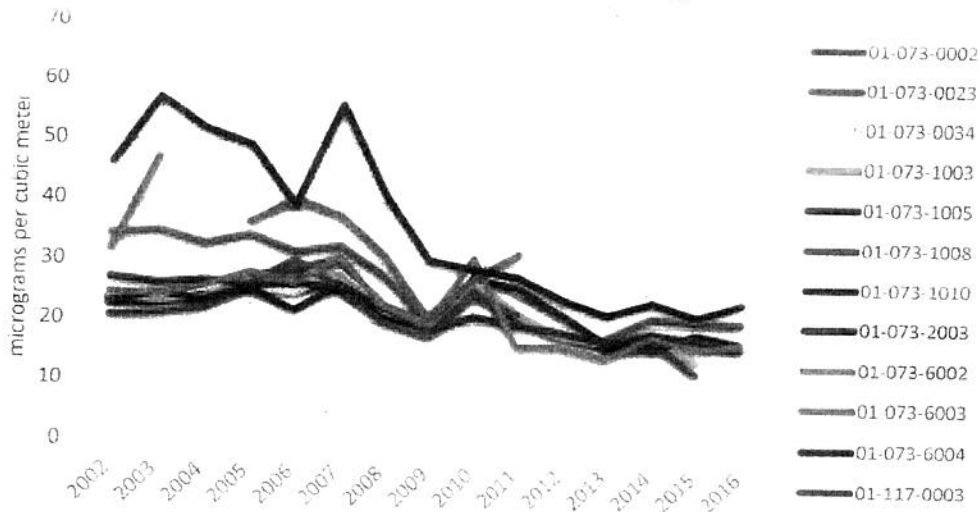
Changes to JCDH's Network

The JCDH is requesting that the PM_{2.5}, particulate matter less than 10 microns (PM₁₀), and sulfur dioxide (SO₂) monitors at the Shuttlesworth ambient air monitoring site (AQS #01-073-6004) be redesignated as special purpose monitors (SPMs) rather than SLAMS monitors as listed in the 2016 annual network plan. Forty (40) CFR §58.20 provides flexibility to agencies for conducting short term special purpose monitoring. While these SPMs should be listed in periodic assessments and the annual network plan, they do not count towards meeting any federal minimum requirement. EPA approval is not required for discontinuance of SPMs.

The PM_{2.5} sampler being used is a non-regulatory tapered element oscillating microbalance (TEOM) sampler. The data generated from it is used to inform the JCDH and the public about the general air quality in the vicinity but cannot be used for regulatory decision making purposes (i.e., attainment of air quality standards). The requested change in designation of the PM_{2.5} sampler to an SPM is approved going back to an effective date of January 1, 2017. The EPA encourages the JCDH to continue operating this monitor because it provides valuable hourly data to the EPA's AirNow network.

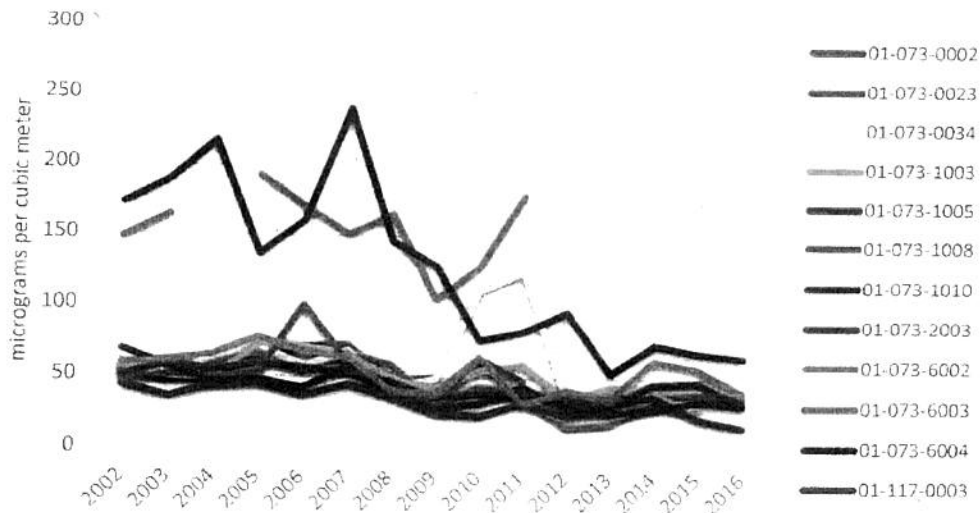
The PM₁₀ sampler is being operated using an approved continuous method and the data generated can be used for regulatory decision making. Historically, ambient PM₁₀ concentrations measured at this site are higher than any other site in the county (see graphs below – navy blue line on top represents the data from the PM₁₀ monitor(s) at the Shuttlesworth site). The Shuttlesworth site is, in effect, the maximum concentration site for PM₁₀ in the Birmingham MSA. Since one site in an area should represent the maximum concentration and be identified as such in the network plan as well as in AQS, the EPA believes this monitor should remain classified as a SLAMS.

Birmingham PM₁₀ Monitors 2002-2016 Annual Averages



Birmingham PM₁₀ Monitors 2002-2016 Maximum Values*

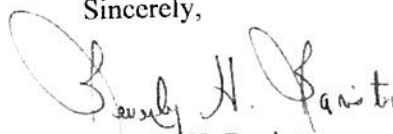
[*If more than one monitor was present at a site, the daily max concentrations were averaged]



The SO₂ analyzer at the Shuttlesworth ambient air monitoring site is a FEM but is not a SLAMS monitor as listed in the 2016 annual network plan. Per an agreement with JCDH, this monitor is being operated for one calendar year unless there are exceedances of any SO₂ NAAQS, upon which time the monitor will be operated for three complete calendar years in order to obtain a design value.

If you have any questions or concerns, please contact Gregg Worley at (404) 562-9141 or Darren Palmer at (404) 562-9052.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly H. Banister".

Beverly H. Banister

Director

Air, Pesticides and Toxics Management Division

cc: Mr. Jonathan Stanton
Director, JCDH

Palmer, Darren

From: Masuca Corey.M <Corey.M.Masuca@jcdh.org>
Sent: Wednesday, October 25, 2017 4:40 PM
To: Palmer, Darren
Subject: Responses to Your Comments on the State Network Plan

Darren,

In response to your comments of the State of Alabama Annual Network Plan, the Department submits the following salient comments.

Concerning the discontinuation of monitoring at the Hoover site, per previous correspondence and discussions, the Department will develop a strategy and provide data, including using the recommended strategies and suggestions provided by EPA (for discontinuation of monitoring), to validate the proposed discontinuation of monitoring.

Concerning the designation of the Shuttlesworth site as the "maximum concentration site" for PM10, while the concentrations are among the highest in the county at this site, the Department still maintains it's determination that this site (for PM10) should be designated as a Special Purpose Monitoring (SPM) site only and not a SLAM site. Accordingly, until this issue is resolved between the Department and EPA, the Department maintains its previous determination of the non-designation of this monitoring site as a/the "maximum concentration site" for PM10.

Thanks,

*Corey Masuca, PE, PhD
Principal Air Pollution Control Engineer
Jefferson County Department of Health
Environmental Health Svcs.
Air & Radiation Protection Program
1400 Sixth Avenue South
Birmingham, AL 35233
(205) 930-1595 (office)
(205) 960-0056 (cell)
corey.m.masuca@jcdh.org*

Palmer, Darren

From: Masuca Corey.M <Corey.M.Masuca@jcdh.org>
Sent: Wednesday, November 15, 2017 4:13 PM
To: Palmer, Darren
Subject: Re: Proposed Agenda Items for Tomorrow's Conference Call after the SEDS Monthly Conference Call

Okay

Sent from my iPhone

On Nov 15, 2017, at 2:54 PM, Palmer, Darren <Palmer.Darren@epa.gov> wrote:

Corey, Gregg is on travel this week and, since this topic (Shuttlesworth PM10 SLAMS v SPM Designation – Update) has been elevated, it will need to be addressed on a later call when he can attend.

From: Masuca Corey.M [mailto:Corey.M.Masuca@jcdh.org]
Sent: Wednesday, November 15, 2017 1:11 PM
To: Palmer, Darren <Palmer.Darren@epa.gov>; Guillot, Richard <Guillot.Richard@epa.gov>; lynn.geter@jcdh.org; Allison Perry <Allison.Perry@jcdh.org>; matt.lacke@jcdh.org; jason.howanitz@jcdh.org
Subject: RE: Proposed Agenda Items for Tomorrow's Conference Call after the SEDS Monthly Conference Call

One more thing: Shuttlesworth PM10 SLAMS v SPM Designation – Update

From: Masuca Corey.M
Sent: Wednesday, November 15, 2017 12:09 PM
To: Palmer.Darren@epa.gov; 'guillot.richard@epa.gov' <guillot.richard@epa.gov>; Geter, Lynn S. <Lynn.Geter@jcdh.org>; Perry, Allison H. <Allison.Perry@jcdh.org>; Lacke, Matt <Matt.Lacke@jcdh.org>; Howanitz, Jason <Jason.Howanitz@jcdh.org>
Subject: Proposed Agenda Items for Tomorrow's Conference Call after the SEDS Monthly Conference Call

- Discontinuation Efforts for Hoover – Update
- Recertification of 2016 Ozone Data and Addressing Inclusion of Flags
- Wylam Information/Questions –
- QAPPs
 - o Status of Criteria Pollutant QAPP – R. Guillot
 - o Status of NCore QAPP – Lynn/Darren – Data Quality Objective Tables
 - o Near Road QAPP
 - o Others
- QMP – Status/Update – Submitted to EPA
- Air Pollution Data Quality Assurance Analyst - Update
- Etc.

Palmer, Darren

From: Howanitz, Jason <Jason.Howanitz@jcdh.org>
Sent: Thursday, December 1, 2016 11:53 AM
To: Palmer, Darren
Subject: Shuttles worth [WARNING: SPF validation failed]

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Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

Palmer, Darren

From: Howanitz, Jason <Jason.Howanitz@jcdh.org>
Sent: Thursday, December 1, 2016 1:38 PM
To: Palmer, Darren
Subject: Re: Shuttlesworth [WARNING: SPF validation failed]

We are on the same page. I am on my own time (just wanted to visit it while it was fresh).

I will get with you next week on our intention to submit an addendum.

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

On Dec 1, 2016, at 12:31 PM, Palmer, Darren <Palmer.Darren@epa.gov> wrote:

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(b) (6)

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samplers (I understand there is no manual sampler there anymore). I can email you all the network plans. But these are the final official documents of your network even if you didn't review what ADEM submitted. What's in AQS doesn't go through public comment. Your agency's unwritten intentions don't go through public comment. What is written in these documents do - whether intended or not. We've made mistakes before by not carefully reviewing every little descriptor listed for each site. This is why we require all proposed changes be clearly stated up front in each plan and we try to clearly respond what we are and are not approving. If ADEM is modifying the document you send to them - more than just administrative changes, that is a conversation y'all need to have to clear that up.

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2. you can spell all this out in the annual network plan due July 1, 2017.

Also, just stating that you never intended for a monitor to be labeled SLAMS, isn't going to get very far with us (at least not at the staff level). Just being honest.

Third, I'm not sure, but it almost seems if there is a misunderstanding of SLAMS vs SPM with regards to NAAQS comparability. You ask several different people here in Region 4 (Atlanta and Athens), and you'll likely get a couple different answers on what the label "SLAMS" indicates. My opinion is that any FRM/FEM monitor labeled SLAMS is NAAQS comparable. Certainly monitors that are required by regulations should be labeled SLAMS. Where the difference of opinion comes in is with regards to PM2.5 TEOMs (and not with SO2 or PM10). 40 CFR Part 58 App. D 4.7.2 requires continuous PM2.5 monitors to be collocated in MSA's with required PM2.5 monitors. When this part of the regulation was promulgated we didn't have continuous FEMs. So while TEOMs satisfy that requirement, we all know they aren't designated as an equivalent method for NAAQS comparison purposes. Some think these should be labeled SLAMS because they are required by the regs. I'm of the opinion they don't have to be. In fact, I'd actually prefer they NOT be labeled SLAMS – but there is nothing in the regs that really make this clear.

Ok, having said all that... monitors labeled SPM but using regulatory methods can still be compared to the NAAQS. <-- it's this that I need to make sure you and others in your agency are aware. The regs are clear in 40 CFR §58.20(c) that SPMs operating for longer than 24mo are absolutely comparable (if they employ FRM/FEM). And 40 CFR §58.20(e) states that EPA won't base a nonattainment designation on a SO2 or PM10 monitor (or CO or NO2) solely on the data from that SPM if it is discontinued within 24mo. So just because a particular criteria pollutant monitor or analyzer is labeled SPM, that doesn't preclude EPA from considering any data produced.

[In my opinion, agencies who are requesting a change in monitor type from SLAMS to SPM, are doing so in order to have the 'flexibility' to shut them down on a whim without 'getting permission'. While I can understand the glamour behind that sentiment, again, my opinion is it is disingenuous and misleading.]

Any of us are happy to have further conversations with you and anyone else there.

This upcoming year, you are welcome to submit to us the same plan that you initially submit to ADEM. But again, I'd encourage you to always look at the combined plan that goes out for public comment including ADEM's description of changes to your network.

Darren Palmer
USEPA - Region 4
APTMD/AASB
Air Data & Analysis Section
PH: (404) 562-9052
FX: (404) 562-9095
<http://www.epa.gov/region4>

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-----Original Message-----

From: Howanitz, Jason [<mailto:Jason.Howanitz@jcdh.org>]
Sent: Thursday, December 01, 2016 11:53 AM
To: Palmer, Darren <Palmer.Darren@epa.gov>
Subject: Shuttles worth [WARNING: SPF validation failed]

Darren,

After reviewing the drafts we sent and the final one ADEM sent us and comparing to the public noticed document, that a mistake was made after we sent our plan. We only had PM10 as a SLAMS site (or even on the table) . Not sure how that happened but we will be working to amend that. Also, if we were not planning on operating SLAMS in 2016, am I crazy to ask why it is covered under the 2016 plan?

I am working from home with a sick child.

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

Garver, Daniel

From: Rinck, Todd
Sent: Friday, April 20, 2018 11:16 AM
To: Palmer, Darren; Garver, Daniel
Subject: FW: Shuttlesworth SO2
Attachments: 2016_ADEM_ANP_Addendum_EPA_Response_060517.pdf

FYI.

From: Banister, Beverly
Sent: Friday, April 20, 2018 8:25 AM
To: jason.howanitz@jcdh.org
Cc: Worley, Gregg <Worley.Gregg@epa.gov>; Rinck, Todd <Rinck.Todd@epa.gov>
Subject: Shuttlesworth SO2

Good Morning Jason,
Hope all is well. Apologies Todd Rinck provided this letter to me last week and I am just now sending it to you. Based on our discussion in Lexington I went back to staff to refresh my memory on where we had landed on whether the Shuttlesworth SO2 monitor was a SLAMS monitor. Please see the April 7 network plan addendum letter (attached) where we included the following language.

The specific language reads:

The SO2 analyzer at the Shuttlesworth ambient air monitoring site is a FEM but is not a SLAMS monitor as listed in the 2016 annual network plan. Per an agreement with JCDH, this monitor is being operated for one calendar year unless there are exceedances of any SO2 NAAQS, upon which time the monitor will be operated for three complete calendar years in order to obtain a design value.

Please let us know if we need further discussion and we will schedule a call.

Beverly

Garver, Daniel

From: Palmer, Darren
Sent: Thursday, February 23, 2017 11:23 AM
To: Garver, Daniel; Brown, Ryan; Farngalo, Zuri
Subject: FW: Changes to Alabama's Network Plan
Attachments: 2-22-17 ALABAMA 2016 AMBIENT AIR MONITORING NETWORK PLAN.pdf

Just rec'd. FYI.

Darren Palmer
USEPA - Region 4
APTMD/AASB
Air Data & Analysis Section
PH: (404) 562-9052
FX: (404) 562-9095
<http://www.epa.gov/region4>

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From: Malaier, Mike [mailto:MML@adem.alabama.gov]
Sent: Thursday, February 23, 2017 11:21 AM
To: Palmer, Darren <Palmer.Darren@epa.gov>; Rinck, Todd <Rinck.Todd@epa.gov>
Subject: Changes to Alabama's Network Plan

Todd and Darren,
The attached letter has been sent to Beverly Bannister.
We are requesting approval of the new sites in Wetumpka and Phenix City.
Also, Jefferson County has made some clarifications about monitoring at the Shuttlesworth site.

As mentioned in our last conference call we are hoping you can review these sites concurrently with the 30 day public notice.

You may want to get a better copy of the document by going to the ADEM Website.

<http://www.adem.state.al.us/programs/air/airquality/2016AmbientAirPlanUpdate.pdf>

Thanks,

Michael E. Malaier
Chief, Air Assessment Unit
Field operations Division
Al. Department of Environmental Management
PO Box 301463
Montgomery, Al. 36130-1463
334-260-2747

Garver, Daniel

From: Howanitz, Jason <Jason.Howanitz@jcdh.org>
Sent: Wednesday, January 11, 2017 10:34 AM
To: Garver, Daniel
Subject: RE: Notification of Exceedances or Violations from SO2 DRR Monitors

Daniel,

We will deal with that scenario if we encounter a violation/exceedance. I would note that we are doing a special study for one year and our only agreement was to do enter all data into AQS. Our monitor is not a SLAMS monitor but got categorized by mistake (not sure how) for the SO2 and I am working on an addendum so it would not fall into that category. I realize the opinion but our responsibilities are well detailed and we will follow those, but I would disagree that we fall under the same DRR requirements since we are not subject to DRR. Having said that, if we do incur an exceedance we will report it "within 30 days of any exceedances or violations." Let me know if you have any questions.

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

From: Garver, Daniel [mailto:Garver.Daniel@epa.gov]
Sent: Wednesday, January 11, 2017 8:00 AM
To: Howanitz, Jason
Cc: Rinck, Todd; Palmer, Darren; Walther, Katherine
Subject: FW: Notification of Exceedances or Violations from SO2 DRR Monitors

Hi Jason,

Todd recently sent the message below to all of the agencies conducting monitoring under the SO2 DRR. I wanted to pass this along because the requirement to report exceedances or violations applies to the Shuttlesworth SO2 monitor as well, even though it is not operating as a DRR monitor. If possible, we would encourage you all to meet this requirement by reporting the data to AirNow. Please let Todd, Darren, or I know if you have any questions about this. Thanks for JCDH's efforts in successfully starting up the SO2 monitor before January 1.

Thanks,

Daniel Garver
Environmental Scientist
US EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
(404) 562-9839

From: Rinck, Todd
Sent: Tuesday, January 10, 2017 4:49 PM
To: Oser, DeAnna <DeAnna.Oser@dnr.ga.gov>; 'John Evans' (john.c.evans@ncdenr.gov)' <john.c.evans@ncdenr.gov>; Joette Steger <joette.steger@ncdenr.gov>; 'John Gowins' <john.gowins@ky.gov>; mml@adem.state.al.us;

'kevin.lance@buncombecounty.org' <kevin.lance@buncombecounty.org>

Subject: Notification of Exceedances or Violations from SO₂ DRR Monitors

Hello State and Local DRR Contacts,

Thank you for your recent efforts in successfully installing the SO₂ Data Requirements Rule monitoring network. I want to remind you that under the Air Planning Agreement (or PPA/PPG as applicable) your agency has committed to notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutant SLAMS or SPMs (which includes the SO₂ DRR monitors).

I understand that some agencies are already meeting this requirement by reporting the SO₂ DRR data to AirNow. We appreciate this data reporting, and encourage all agencies to report the SO₂ DRR monitoring data to AirNow, if possible, as this will increase public availability of the data and efficiently satisfy your grant commitment. However, if your agency decides not to report the data to AirNow, please notify your EPA Region 4 state air monitoring contact and copy Daniel Garver and Katie Walther (Region 4 SO₂ monitoring contacts) within 30 days of any exceedances or violations at the SO₂ DRR monitors.

If you have any questions about how to report data to AirNow or the grant requirement, please feel free to contact me.

Todd

(404) 562-9062

Garver, Daniel

From: Palmer, Darren
Sent: Thursday, December 1, 2016 1:31 PM
To: jason.howanitz@jcdh.org
Subject: RE: Shuttlesworth

Jason, I'm glad y'all have the opportunity to work from home. (b) (6)

So there are a few things here....

First, to help clear up any misunderstanding about monitors (whether SLAMS or not) that are proposed to begin operation after the plan has been either submitted or approved, let me see if I can explain something about the network plan. The network plan is typically considered to represent the current network and cover proposed changes to an agency's network for 1.5 yrs. Example: the plan submitted July 1, 2016 is generally considered to cover the network and any changes from July 1, 2016 through Dec 31, 2017. Also, using this year's network plan as an example, our expectation - unless otherwise proposed and agreed upon - is that proposed changes are approved to occur on by Jan 1, 2017. So if we agreed that a monitor can be discontinued, we are agreeing that it can be shut down on Dec 31, 2016 or after (unless otherwise explicitly stated in our response letter). Same for a new monitor - except in this case we are agreeing that it can be started up no later than January 1, 2017 (unless otherwise stated). Otherwise, our expectation is that monitors that aren't proposed to shut down, will operate for the entirety of the 2017 calendar year (notwithstanding unforeseen circumstances of course). This is not a Region 4 understanding of the network plan. This is an EPA agency general understanding. [after reading back over this paragraph multiple times, I'm not sure how helpful this is. Oh well.]

In fact we have several agencies in Region 4 who called their plan submitted July 1, 2016, the "2017 Annual Network Plan". I personally don't like that as I think that adds a level of confusion, but I understand the reasoning behind it (pretty much for the reasons stated above).

Second, going back a few years (at least back to 2013 when the tables in the plan submitted by ADEM were expanded to include monitor type), the network plans submitted for public comment and reviewed by us all indicate the PM10 monitors are SLAMS at Shuttlesworth - the manual and continuous samplers (I understand there is no manual sampler there anymore). I can email you all the network plans. But these are the final official documents of your network even if you didn't review what ADEM submitted. What's in AQS doesn't go through public comment. Your agency's unwritten intentions don't go through public comment. What is written in these documents do - whether intended or not. We've made mistakes before by not carefully reviewing every little descriptor listed for each site. This is why we require all proposed changes be clearly stated up front in each plan and we try to clearly respond what we are and are not approving. If ADEM is modifying the document you send to them - more than just administrative changes, that is a conversation y'all need to have to clear that up.

So, again, whether your intent is that these monitors are not SLAMS, it isn't listed that way in these final network plans.

You have at least two options. Both involve the public comment process.

1. your agency can submit an addendum to the plan to EPA at any time, clearly describing the changes to your network. I would highly recommend cc'ing ADEM.
2. you can spell all this out in the annual network plan due July 1, 2017.

Also, just stating that you never intended for a monitor to be labeled SLAMS, isn't going to get very far with us (at least not at the staff level). Just being honest.

Third, I'm not sure, but it almost seems if there is a misunderstanding of SLAMS vs SPM with regards to NAAQS comparability. You ask several different people here in Region 4 (Atlanta and Athens), and you'll likely get a couple different answers on what the label "SLAMS" indicates. My opinion is that any FRM/FEM monitor labeled SLAMS is NAAQS comparable. Certainly monitors that are required by regulations should be labeled SLAMS. Where the difference of opinion comes in is with regards to PM2.5 TEOMs (and not with SO2 or PM10). 40 CFR Part 58 App. D 4.7.2 requires continuous PM2.5 monitors to be collocated in MSA's with required PM2.5 monitors. When this part of the regulation was promulgated we didn't have continuous FEMs. So while TEOMs satisfy that requirement, we all know they aren't designated as an equivalent method for NAAQS comparison purposes. Some think these should be labeled SLAMS because they are required by the regs. I'm of the opinion they don't have to be. In fact, I'd actually prefer they NOT be labeled SLAMS – but there is nothing in the regs that really make this clear.

Ok, having said all that... monitors labeled SPM but using regulatory methods can still be compared to the NAAQS. <-- it's this that I need to make sure you and others in your agency are aware. The regs are clear in 40 CFR §58.20(c) that SPMs operating for longer than 24mo are absolutely comparable (if they employ FRM/FEM). And 40 CFR §58.20(e) states that EPA won't base a nonattainment designation on a SO2 or PM10 monitor (or CO or NO2) solely on the data from that SPM if it is discontinued within 24mo. So just because a particular criteria pollutant monitor or analyzer is labeled SPM, that doesn't preclude EPA from considering any data produced.

[In my opinion, agencies who are requesting a change in monitor type from SLAMS to SPM, are doing so in order to have the 'flexibility' to shut them down on a whim without 'getting permission'. While I can understand the glamour behind that sentiment, again, my opinion is it is disingenuous and misleading.]

Any of us are happy to have further conversations with you and anyone else there.

This upcoming year, you are welcome to submit to us the same plan that you initially submit to ADEM. But again, I'd encourage you to always look at the combined plan that goes out for public comment including ADEM's description of changes to your network.

Darren Palmer
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-----Original Message-----

From: Howanitz, Jason [mailto:Jason.Howanitz@jcdh.org]
Sent: Thursday, December 01, 2016 11:53 AM
To: Palmer, Darren <Palmer.Darren@epa.gov>
Subject: Shuttles worth [WARNING: SPF validation failed]

Darren,

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I am working from home (b) (6)

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

Hines, Andrea

From: jason.howanitz@jcdh.org
Sent: Wednesday, April 25, 2018 2:21 PM
To: Banister, Beverly
Subject: Re: Shuttlesworth SO2

Beverly,

I hope everything is well. I apologize for not responding to your email. Thanks for clearing up the SO2 question. I believe Corey will be sending you a response this week .

Thanks

Jason Howanitz, MSCE, PE
Senior Air Pollution Control Engineer
Air and Radiation Protection Division
205-930-1284

On Apr 20, 2018, at 7:25 AM, Banister, Beverly <Banister.Beverly@epa.gov> wrote:

Good Morning Jason,

Hope all is well. Apologies Todd Rinck provided this letter to me last week and I am just now sending it to you. Based on our discussion in Lexington I went back to staff to refresh my memory on where we had landed on whether the Shuttlesworth SO2 monitor was a SLAMS monitor. Please see the April 7 network plan addendum letter (attached) where we included the following language.

The specific language reads:

The SO2 analyzer at the Shuttlesworth ambient air monitoring site is a FEM but is not a SLAMS monitor as listed in the 2016 annual network plan. Per an agreement with JCDH, this monitor is being operated for one calendar year unless there are exceedances of any SO2 NAAQS, upon which time the monitor will be operated for three complete calendar years in order to obtain a design value.

Please let us know if we need further discussion and we will schedule a call.
Beverly

<2016_ADEM_ANP_Addendum_EPA_Response_060517.pdf>

Hines, Andrea

From: Banister, Beverly
Sent: Friday, April 20, 2018 8:25 AM
To: jason.howanitz@jcdh.org
Cc: Worley, Gregg; Rinck, Todd
Subject: Shuttlesworth SO2
Attachments: 2016_ADEM_ANP_Addendum_EPA_Response_060517.pdf

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Please let us know if we need further discussion and we will schedule a call.
Beverly



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 05 2017

Mr. Ronald W. Gore
Chief
Alabama Department of Environmental
Management, Air Division
1400 Coliseum Boulevard
Montgomery, Alabama 36130

Dear Mr. Gore:

Thank you submitting the addendum dated April 7, 2017, to Alabama's annual ambient air network plan (Network Plan Addendum). The Network Plan Addendum proposes changes to the ambient air monitoring networks for both the Alabama Department of Environmental Management (ADEM) and the Jefferson County Department of Health (JCDH). We understand the public comment period ended on March 20, 2017. No comments were received on the proposed relocation of the Wetumpka and Phenix City monitoring sites. However, comments were received on the proposed changes for the JCDH network.

Changes to ADEM's Network

The ADEM requested to relocate an ozone (O_3) site in the Montgomery metropolitan statistical area (MSA) and to combine the O_3 and particulate matter less than 2.5 microns ($PM_{2.5}$) sites into one site in the Phenix City MSA. The ADEM lost its lease for the Dewberry Trail O_3 site (Air Quality System (AQS) # 01-051-0001) in the Montgomery MSA. According to 40 CFR Part 58, Appendix D, Table D-2, the ADEM is required to operate and maintain two O_3 monitoring sites in this MSA. The ADEM proposes to establish a new site at 206 Queen Ann Road, Wetumpka, Alabama. The EPA Region 4 staff visited this location on August 30, 2016, and gave verbal approval to Mike Malaier and Gina Curvin to use it as an O_3 monitoring site. The U.S. Environmental Protection Agency Region 4 staff understand that the ADEM began operating this site (new AQS # 01-051-0002) on March 17, 2017. The EPA formally approves this location to be the second O_3 site in the Montgomery MSA. The site will begin operating in the 2017 O_3 season.

The ADEM is also proposing to combine its O_3 and $PM_{2.5}$ sites in the Phenix City MSA into one single multipollutant monitoring site to be located at the Phenix City-South Girard School (AQS # 01-113-0003). The ADEM lost its lease to the $PM_{2.5}$ site (AQS # 01-113-0001) in September 2016. That site houses collocated $PM_{2.5}$ federal reference method (FRM) samplers, two chemical speciation network samplers, and a continuous $PM_{2.5}$ non-federal equivalent method (FEM) sampler. The ADEM has already moved the collocated $PM_{2.5}$ FRM samplers to the new location (as of January 18, 2017) while the O_3 monitor continues to operate at its original site (AQS # 01-113-0002). The ADEM plans to operate the O_3 monitor at the original site for the full 2017 ozone monitoring season ending October 31, 2017, at which time the site will be shut down and the equipment will be relocated to the Phenix City-South Girard School site.

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O₃ monitoring will resume at the newly combined site on or by March 1, 2018. The EPA approves this plan. For each of these new sites, please be sure to update the network plan with photos and evidence the site meets siting criteria found in 40 CFR Part 58, Appendix E. Also, all of the criteria pollutant monitors should be designated as State or Local Air Monitoring Stations (SLAMS) in EPA's Air Quality System since they are required.

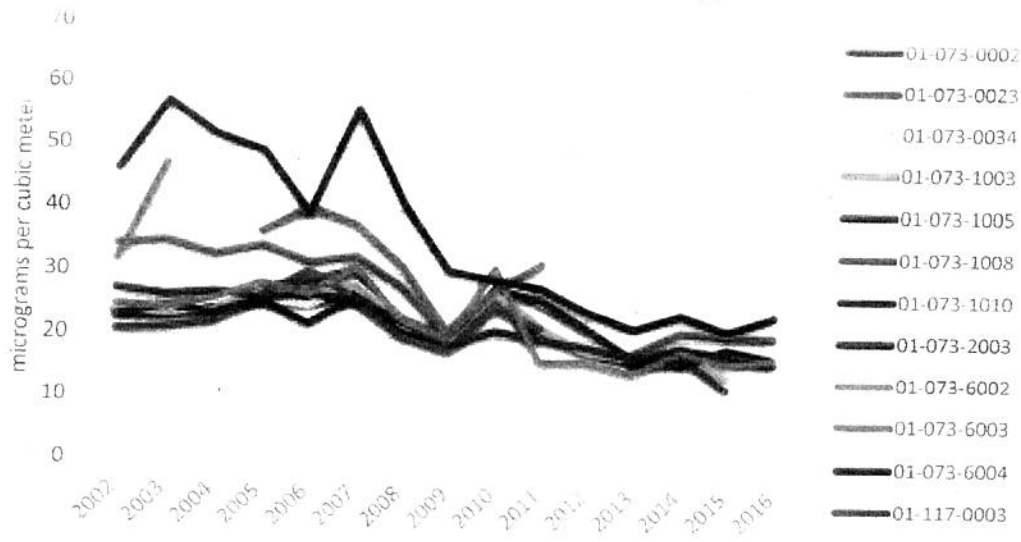
Changes to JCDH's Network

The JCDH is requesting that the PM_{2.5}, particulate matter less than 10 microns (PM₁₀), and sulfur dioxide (SO₂) monitors at the Shuttlesworth ambient air monitoring site (AQS #01-073-6004) be redesignated as special purpose monitors (SPMs) rather than SLAMS monitors as listed in the 2016 annual network plan. Forty (40) CFR §58.20 provides flexibility to agencies for conducting short term special purpose monitoring. While these SPMs should be listed in periodic assessments and the annual network plan, they do not count towards meeting any federal minimum requirement. EPA approval is not required for discontinuance of SPMs.

The PM_{2.5} sampler being used is a non-regulatory tapered element oscillating microbalance (TEOM) sampler. The data generated from it is used to inform the JCDH and the public about the general air quality in the vicinity but cannot be used for regulatory decision making purposes (i.e., attainment of air quality standards). The requested change in designation of the PM_{2.5} sampler to an SPM is approved going back to an effective date of January 1, 2017. The EPA encourages the JCDH to continue operating this monitor because it provides valuable hourly data to the EPA's AirNow network.

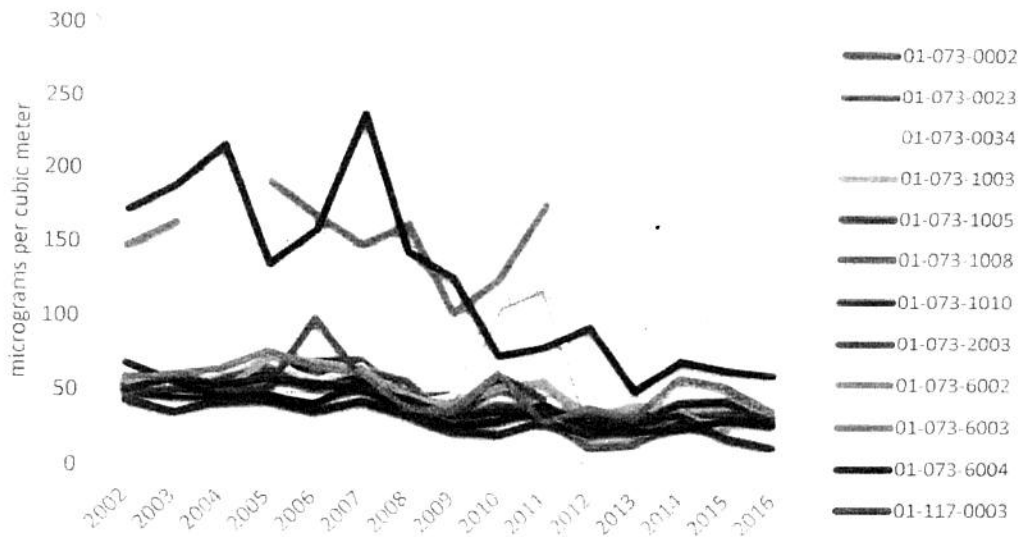
The PM₁₀ sampler is being operated using an approved continuous method and the data generated can be used for regulatory decision making. Historically, ambient PM₁₀ concentrations measured at this site are higher than any other site in the county (see graphs below – navy blue line on top represents the data from the PM₁₀ monitor(s) at the Shuttlesworth site). The Shuttlesworth site is, in effect, the maximum concentration site for PM₁₀ in the Birmingham MSA. Since one site in an area should represent the maximum concentration and be identified as such in the network plan as well as in AQS, the EPA believes this monitor should remain classified as a SLAMS.

Birmingham PM₁₀ Monitors 2002-2016 Annual Averages



Birmingham PM₁₀ Monitors 2002-2016 Maximum Values*

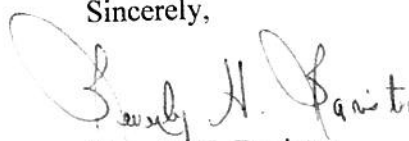
[*If more than one monitor was present at a site, the daily max concentrations were averaged]



The SO₂ analyzer at the Shuttlesworth ambient air monitoring site is a FEM but is not a SLAMS monitor as listed in the 2016 annual network plan. Per an agreement with JCDH, this monitor is being operated for one calendar year unless there are exceedances of any SO₂ NAAQS, upon which time the monitor will be operated for three complete calendar years in order to obtain a design value.

If you have any questions or concerns, please contact Gregg Worley at (404) 562-9141 or Darren Palmer at (404) 562-9052.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly H. Banister".

Beverly H. Banister

Director

Air, Pesticides and Toxics Management Division

cc: Mr. Jonathan Stanton
Director, JCDH